



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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Aug 16 2010

Theresa M. Berry
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P.O. Box 3621
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**Subject: Comments on the DEIS for Central Ferry-Lower Monumental Power
Transmission Line Project (EPA Project # 09-031-BPA)**

Dear Ms. Berry:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bonneville Power Administration (BPA) Draft Environmental Impact Statement (DEIS) for the proposed **Central Ferry-Lower Monumental Transmission Line Project** (CEQ# 20100239) in Garfield, Columbia, and Walla Walla Counties, WA in accordance with the National Environmental Policy Act (NEPA) and §309 of the Clean Air Act (CAA). Section 309 of the CAA requires EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we also evaluate the document's adequacy in meeting NEPA requirements.

The DEIS analyzes potential environmental impacts associated with a proposal to construct, operate, and maintain a single-circuit 500-kV transmission line that would extend from the proposed Central Ferry Substation in Garfield County to the existing Lower Monumental Substation in Walla Walla County, WA. This transmission line corridor would be 38-40 miles long and 150 feet wide and would cross both state and private lands used predominantly for crops and grazing. Other project infrastructure includes 167-178 lattice steel towers that would be sited on a half acre area each. The project is needed to increase power transmission capacity in southeast Washington area where power generation and requests for interconnection to the federal grid continue to exceed existing capacity. Analysis of the project impacts considered four routing alternatives and a No Action. The DEIS does not identify a Preferred Alternative.

We note with appreciation that the DEIS addresses many of the issues we raised during the project scoping period in August 2009, including analysis of cumulative and climate change effects. Overall, most impacts by the project would be due to construction activities, which would generate both temporary and permanent impacts. In particular, EPA is concerned about the project's potential impacts to water quality, land use and farmlands, and other resources as discussed below.

Water quality

The DEIS indicates that water quality may be adversely affected if the project construction alters the hydrology of springs and surface runoff such that erosion carries sediment to nearby waterbodies (p. 3-87). While we recognize that there will be between 970-1610 feet of buffer on either side of the Tucannon River to avoid direct water quality impacts there, the project will cross almost 40 drainages altogether, and the combination of vegetation removal, erosion, and sediment loading could exacerbate conditions in streams on Washington State's list of impaired water bodies due to turbidity and thermal effects. Also please note that antidegradation provisions of the Clean Water Act apply to those waterbodies where water quality standards are currently being met. Thus, we recommend that BPA coordinate with Washington State Department of Ecology and affected Tribes to assure that the state and tribal water quality standards will be met during implementation of the proposed action.

Since the project anticipates obtaining a National Pollutant Discharge Elimination System (NPDES) permit for planned construction activities likely to disturb up to 361 acres, the final EIS should include updated information on the permit application process and measures to protect water quality.

Land use and farmland impacts

The DEIS indicates that more than half of the project corridor would involve lands that have been designated as prime farmland, and lands managed under the Conservation Reserve Program (CRP) (Table 3-7, p. 3-16). Even though some areas would be disturbed temporarily and be restored afterwards, other areas would be impacted permanently. Depending on the routing alternative selected, such permanent impacts to farmlands would involve 178 – 189.5 acres, while temporary impacts would affect up to 361 acres (p. S-15). The Farmland Protection Policy Act (FPPA) includes prime farmland, unique farmland, and land of statewide or local importance (see <http://www.nrcs.usda.gov/programs/fppa/>). Farmlands that are contiguous to sensitive areas, such as floodplains, wetlands, and aquifer recharge zones play important roles in buffering these areas from development and should be protected. Thus, the FPPA seeks to assure that federal actions are designed in a manner compatible with state and local policies and programs to protect farmlands.

Because of potential impacts to farmlands and subsequent loss of crops and wildlife habitat, we recommend BPA coordinate with the Natural Resources Conservation Service (NRCS) and/or USDA Service Center and the Farm Service Agency in assessing the project impacts to farmlands, including loss of CRP lands and determining measures to be followed to avoid and minimize any significant impacts to farmlands. The final EIS should include information about NRCS analysis and rating of the potential impacts, and what will be done to restore farmlands and compensate landowners for losses incurred due to the project.

Vegetation and Wildlife

Sections 3.3.2 and 3.5.2 discuss the project's impacts to vegetation and wildlife species. The DEIS indicates that impacts to these resources would range from moderate to high for native grasslands and up to moderate impacts to some wildlife species, including golden eagles. In order to further inform the decision maker and public about potential impacts to these resources, it would be beneficial to discuss monitoring results for the existing BPA transmission line corridor which is adjacent to the proposed corridor. If this information is available, the final EIS should include a summary of such monitoring results, note adverse and positive impacts and discuss implications for the proposed project.

The DEIS indicates that several federal and state species of concern also have the potential to occur in the project area (p. 3-30). Given the potential usage of the project area by golden eagles and other species of concern (p. 3-59) and limited use surveys conducted in 2009, it is important to work with the USFWS to determine the level of risk to the species and identify ways to reduce the risks. If monitoring data for the existing transmission corridor exist, they would be useful for that conversation as well. We recommend that the final EIS include outcomes of the work with the USFWS.

Consultation with Tribal Governments

The draft EIS indicates that there have been contacts with Tribes that may be affected by the proposed project. The final EIS should include a discussion of how issues raised by Tribes were addressed. This is especially important because the DEIS states that possible impacts to traditional cultural properties will not be known until affected tribes have completed their assessment.

Monitoring

The proposed project has the potential to impact resources within the proposed corridor for a long time. Therefore, we recommend that the final EIS describe a monitoring program designed to assess both impacts from the project and the effectiveness of the proposed mitigation measures for the impacts. The document should also indicate how the program would use an effective feedback mechanism to assure environmental objectives would be met throughout the project lifespan.

Based on the concerns discussed above, we are assigning a rating of EC-2 (Environmental Concerns – Insufficient information) to this DEIS. A copy of the rating system used in conducting our review is enclosed for your reference.



We appreciate the opportunity to provide comments on the DEIS. If you have questions about our comments, please contact me at (206) 553-1601 or Theo Mbabaliye of my staff at (206) 553-6322.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure:

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.